

**FILED**  
JEANNE A. NAUGHTON, CLERK

**FILING ATTORNEY'S NAME:**

MICHAEL R. STANZIONE, ESQ.-ID#003712012  
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236 Washington Street  
Toms River, NJ 08753  
732-349-1212  
Attorneys for Objector Compound Properties, LLC

OCT 28 2020

U.S. BANKRUPTCY COURT  
TRENTON, NJ  
BY JW DEPUTY

**In re:**

**United States Bankruptcy  
Court  
For the District of New Jersey**

**Antero B. Gonzales, JR.,**

**CASE NO. 19-17585 (KCF)**

**Debtor.**

**Honorable Kathryn C.  
Ferguson**

**NOTICE OF OBJECTION**

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TO: Honorable Kathryn C. Ferguson  
United State Bankruptcy Judge  
United States Court House  
402 East State Street  
Trenton, NJ 08608

**PLEASE TAKE NOTICE** that the undersigned, attorney for the Objector, Compound Properties, LLC, is filing a limited objection to the sale motion filed by Brian T. Crowley Esquire, Counsel to the Chapter 7 Trustee. Compound Properties, LLC is submitting an all cash higher and better offer of \$285,000.00 for the property commonly known as 246 South Street, Freehold, New Jersey 07728.

**HIERING, DUPIGNAC, STANZIONE,  
& DUNN, P.C.**  
**Attorneys for Plaintiff**

By:

  
**MICHAEL R. STANZIONE**

Dated: October 26, 2020

S:\WPDOCS\REALESTATE\Compound Properties, LLC - General\Notice of Objection to Sale of Estate's Interest in Certain Real Property located at 246 South Street Freehold.docx



Hiering, Dupignac,  
Stanzione & Dunn, P.C.  
ATTORNEYS AT LAW

William T. Hiering  
(1946-2005)

Frank J. Dupignac, Jr.

Richard D. Stanzione

Lynne A. Dunn  
Also Admitted in FL & PA  
Rule 1:40 Qualified Mediator

Paige E. Baran  
Also Admitted in NY

Michael R. Stanzione  
Also Admitted in PA

Yuliya V. Tedeschi  
Also Admitted in PA

October 27, 2020

Honorable Kathryn C. Ferguson  
United States Bankruptcy Judge  
United States Court House  
402 East State Street, Courtroom #2  
Trenton, NJ 08608

**RE: In Re: Antero B. Gonzales, Jr.**  
**Case No. 19-17585 (KCF)**

Dear Judge Ferguson:

Please be advised that I represent the Objector, Compound Properties, LLC, in connection with the above captioned matter. Enclosed please find an original and one copy of Notice of Objection for filing. I would respectfully request a "filed" copy of the same be forwarded to me in the enclosed self-addressed stamped envelope.

Respectfully submitted,

**HIERING, DUPIGNAC, STANZIONE  
& DUNN, P.C.**



**MICHAEL R. STANZIONE**

MRS/mm

Enclosures

S:\WPDOCS\REALESTATE\Compound Properties, LLC - General\10-27-2020 ltr to Judge Ferguson with Notice of Objection.docx